

June 24, 2022

VIA ECF

The Honorable Sarah L. Cave
 United States District Court for the Southern District of New York
 500 Pearl St.
 New York, NY 10007

Catherine McKoy, et al. v. Trump Corp., et al., 1:18-cv-9936 (LGS-SLC)

Dear Judge Cave:

The parties submit this joint letter-motion pursuant to Section I.E of the Court's Individual Rules and the Court's June 17, 2022 Order, ECF No. 438, to respectfully propose a Sixth Amended Case Management Plan and Scheduling Order.¹

As we previously reported, ECF No. 437, the parties have worked cooperatively to schedule depositions during June, July, and August, in accordance with the Court's guidance during the May 18 conference. In view of these deposition dates, the parties require a modest extension of the fact discovery deadline set forth in the Fifth Amended Case Management Plan and Scheduling Order, ECF No. 357, and have proposed certain other modifications to the schedule in order to remain on substantially the same track toward trial, as set forth below and in the proposed Sixth Amended Case Management Plan and Scheduling Order submitted herewith:

	Current	Proposed
Completion of Fact Discovery	June 29, 2022	Aug. 31, 2022
Completion of Expert Discovery	Dec. 19, 2022	Jan. 24, 2023
Plaintiffs' Class Certification Motion	Feb. 6, 2023	Feb. 14, 2023
Joint Letter pursuant to Individual Rule IV.A.2	Feb. 13, 2023	Feb. 21, 2023
Defendants' Opposition to Class Certification	Mar. 24, 2023	Apr. 1, 2023
Plaintiffs' Reply in Support of Motion for Class Certification	Apr. 23, 2023	Apr. 28, 2023

If this joint proposal is acceptable to the Court, the parties will also confer on interim expert discovery deadlines and make a further joint submission relating thereto. *See generally* ECF No. 356.

Respectfully submitted,

¹ We note that the parties have continued to use Judge Schofield's form Case Management Order, for the sake of consistency, and have removed the paragraph mandating monthly status letters pursuant to the Court's Order dated May 23, 2022, ECF No. 426.

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